### MISELESS CONSUMESS ALLIANCE INC.

### EX PARTE OR LATE FILED

May 6, 1999

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W., Room 8143
12<sup>th</sup> Street Lobby, TW-A325
Washington, DC 20554



RE: CC Docket No. 94-102

Dear Ms. Salas:

On May 4, 1999, the Wireless Consumers Alliance, represented by Carl Hilliard, Denise Blomme, Sharon Hilliard, Jon Linkous, David Carey met with Robert Calaff of Commissioner Powell's office at the Federal Communications Commission regarding the above referenced proceeding.

The attached information was distributed at the meeting.

Pursuant to Section 1.1206 of the Commissioner's Rules, an original and one copy of their letter and its attachments are being filed with your office.

Sincerely,

Carl Hilliard

Carl Heller

Attachment

No. of Copies rec'd OT / List ABCDE

### Wireless Consumers Alliance

### Strongest Signal Proposal

The Alliance requests that the FCC order the remove of the artificial barrier, inserted by wireless carriers, that prevents handsets from performing a normal scan of <u>all</u> channels to select the best channel available when 9-1-1 is dialed.

The following information summarizes the statements and issues before the Commission.

# Wireless phones are not reliable in all emergency situations. The public is at risk.

- Safety & security is the number one reason for owning a wireless phone.
- Consumers rely on misleading and false advertising by the wireless industry.
   Complete coverage is just not possible.
- The industry wants to make wireless phones the primary form of personal telecommunication: "Just like your wireline phone."
- Tragedies from unconnected 9-1-1 calls are here and on the rise.

The Commission has a clear responsibility to ensure public safety. There should be <u>NO</u> compromise when public safety is at stake.

# The Carriers control the equipment market with no interest in promoting better connections to 9-1-1.

- Carriers have blocked the deployment of strongest signal (Audiovox).
- There is no motivation for the industry to maximize public access to 9-1-1 services. It is a non-profit making service.
- Misleading consumer advertising is commonplace while emergency access abilities are misstated.
- If the decision is left up to the carriers, the public will be shortchanged.

Generic rule language (a handset must be able to seek out the other analog cellular carrier if the 9-1-1 call "does not go through") will NOT fix the problem.

- The handset does not know if the call is connected.
  - The handset can lock-in to an inadequate signal.
  - Poor channels can be selected.
    - Static and cross talk.
    - Dropped calls.
- Time delay cannot exceed 12 seconds.
  - A/B Roaming
    - Re-registration can take up to 18 seconds.
    - Retry can take up to 65 seconds.
  - Strongest Signal
    - 4-6 seconds.
- Motorola's Network Solution is an alternative solution but...
  - Lengthy time to develop
    - "Lives may be unnecessarily lost waiting for appropriate technological solutions."
  - Expensive
    - Extensive changes to software/hardware for the base stations.

Strongest Signal (all channel scanning) gives the caller the best available channel of communication for 9-1-1 calls — simple A/B or even automatic A/B does not.

- Strongest signal can be quickly deployed at a trivial cost.
  - Automatic A/B will take 3 times longer to deploy. It is more complex and is more expensive.
- Call connect time favors strongest signal.
  - Strongest signal takes 4-6 seconds, up to 65 seconds for A/B.
- Automatic A/B has serious flaws
  - Lock-in limits the effectiveness of automatic A/B.
  - CTIA uses cover-up terms such as the call was "completed," "successfully sent" or the handset is in a "conversation state" to imply that the call has been connected. This is not true.
  - Automatic A/B can lead to poor quality channels with static, cross-talk and dropped calls.
- The so-called "objections" to strongest signal are without basis in fact.
  - False and misleading statements have been made over and over again:
    - False -"Automatic A/B considers elements of call set up which Strongest Signal does not."
    - Misleading -"Strongest Signal will not always give you the strongest voice channel"

### Conclusion

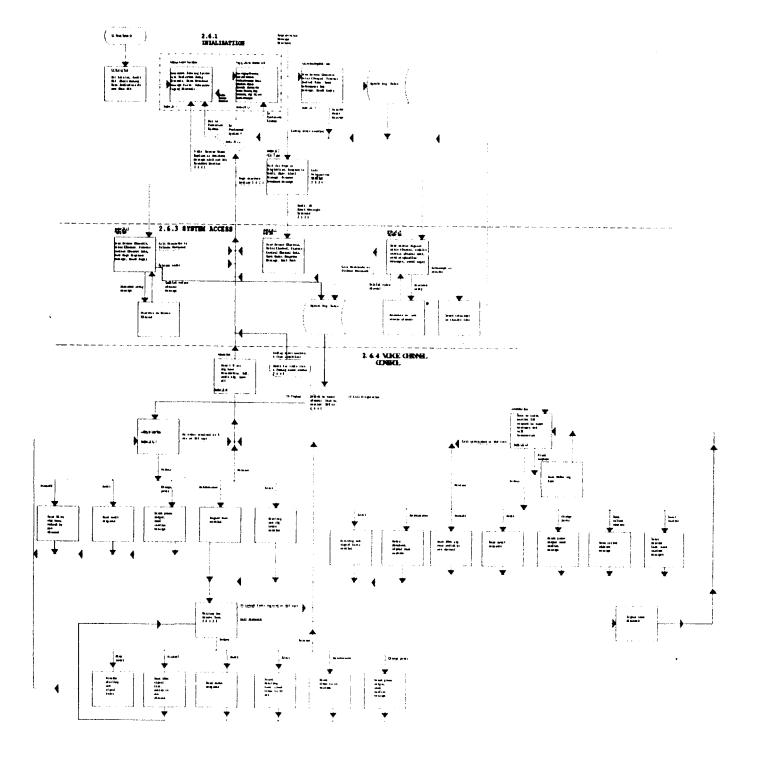
- The Commission has found that the public interest requires access to 911 over the wireless system "that will provide the quickest and most reliable and accurate response."
- After more than four years the only viable solution that has been proposed is strongest signal.

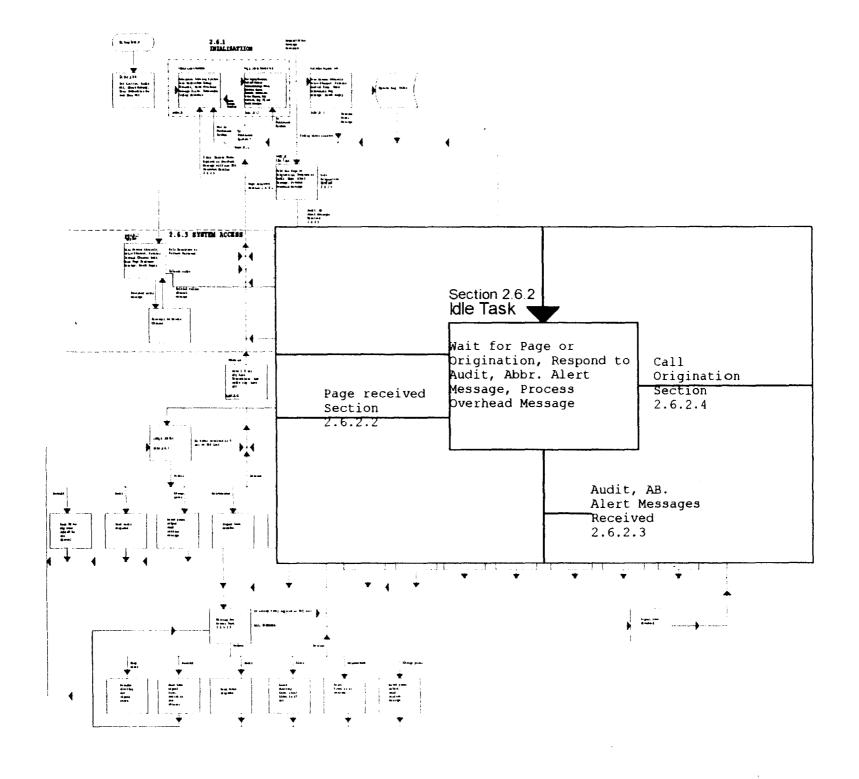
## Software Modifications

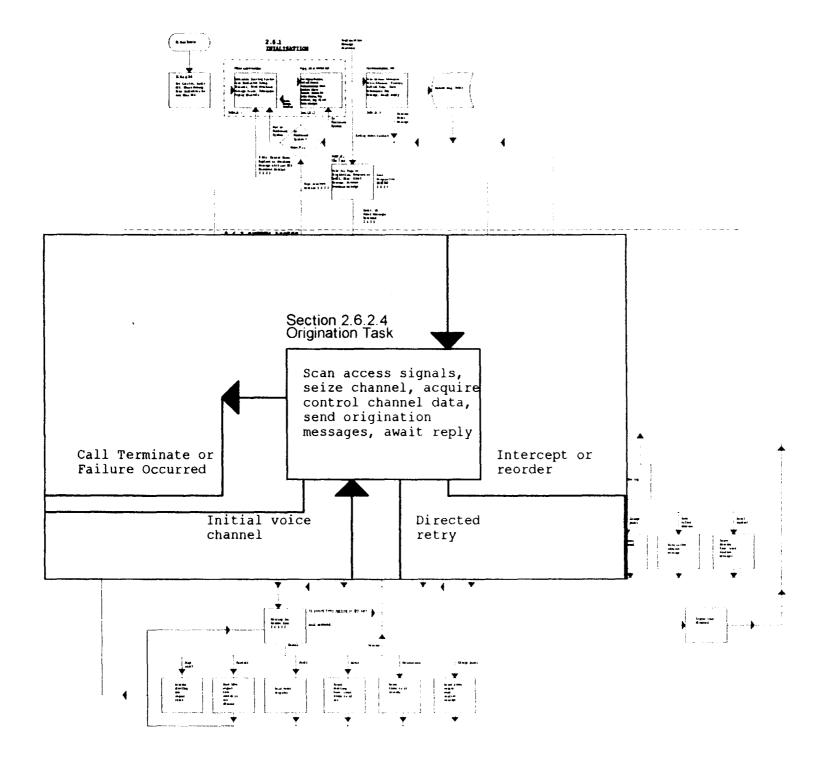
Strongest Signal
Strongest/Adequate Signal

## Strongest Signal

Scan all 42 control channels
Section 2.6.3.2
Lock on strongest channel
Seize Reverse Control Channel
Connect to the PSAP







( K == NC2 ) 2.6.1 \*\*\*\*

NON911:

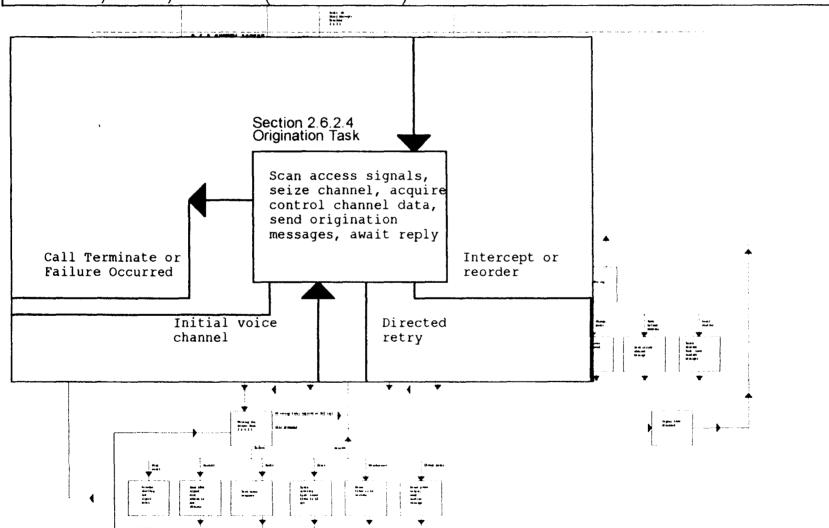
MOVW

BA,#IDCCA; Set A and B register to First Dedicated Control Channel of A system (333)

JBS SSS\_B, DCCHS1; Jump to DCCHS1 if SSS\_B is set to true (This is the A system)

MOVW BA, #IDCCB; Set A and B register to First Dedicated Control Channel of B system (334)

MOV R6,#NDED; Set R6 to 21 (NDED contains 21)

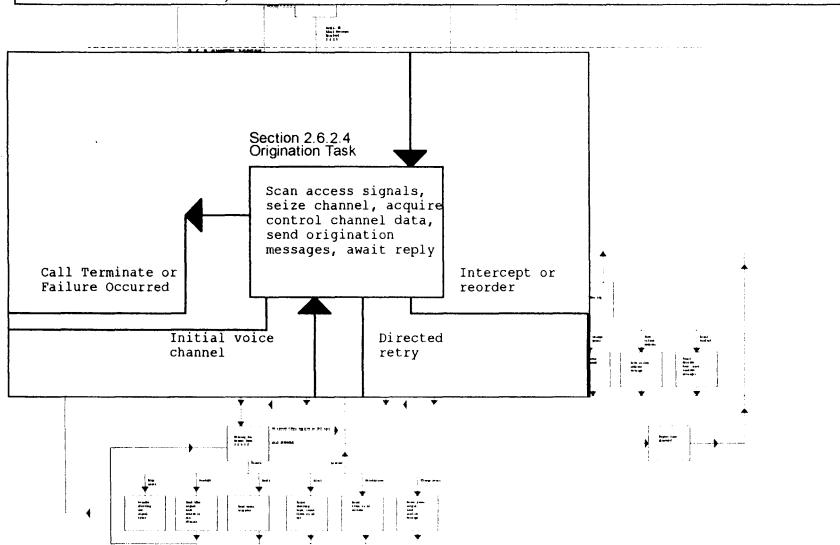


ST B,CHAN\_D+1; Store the Channel number from above into the Channel Variable

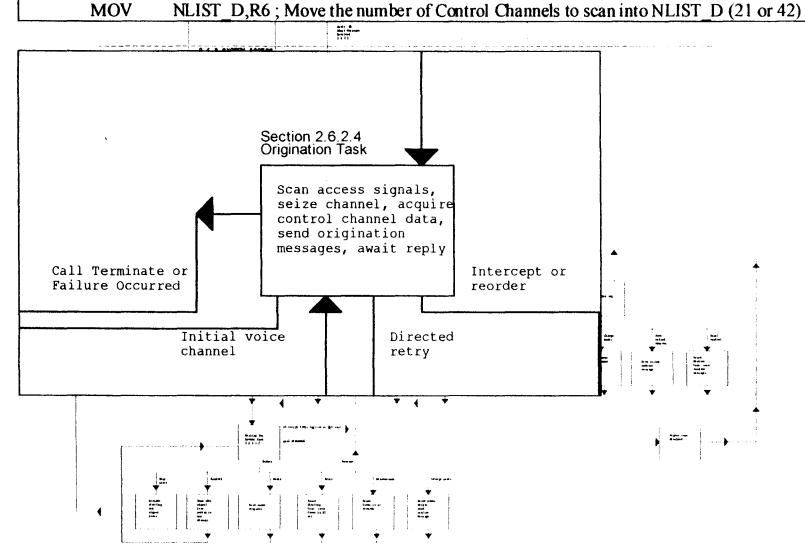
ST A, CHAN\_D

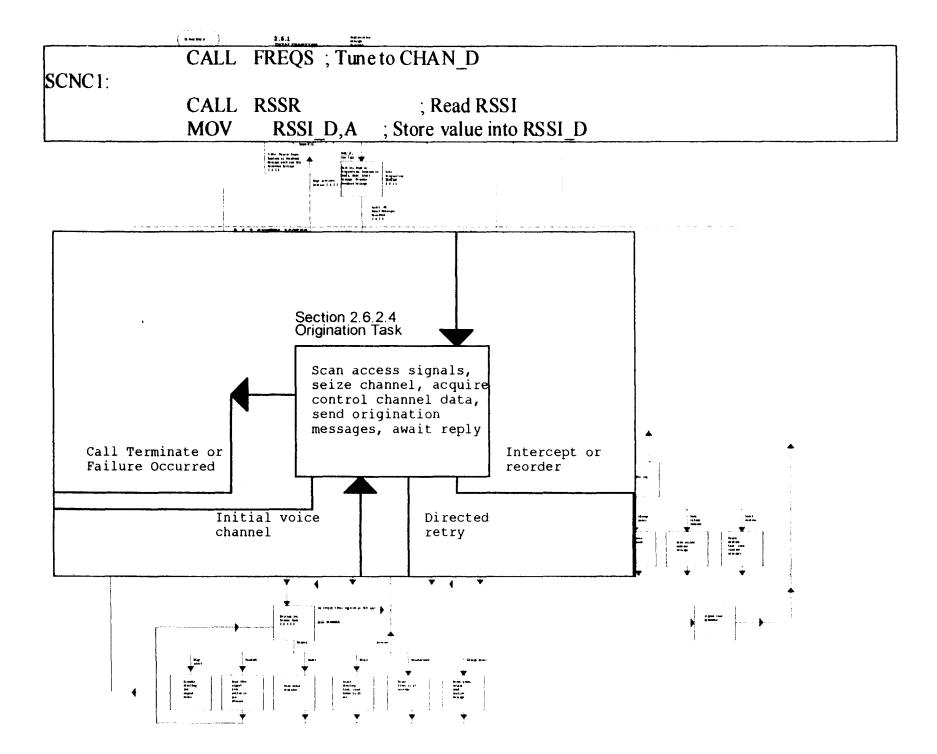
MOV R6,#NDED; Set R6 to 21 (NDED contains 21)

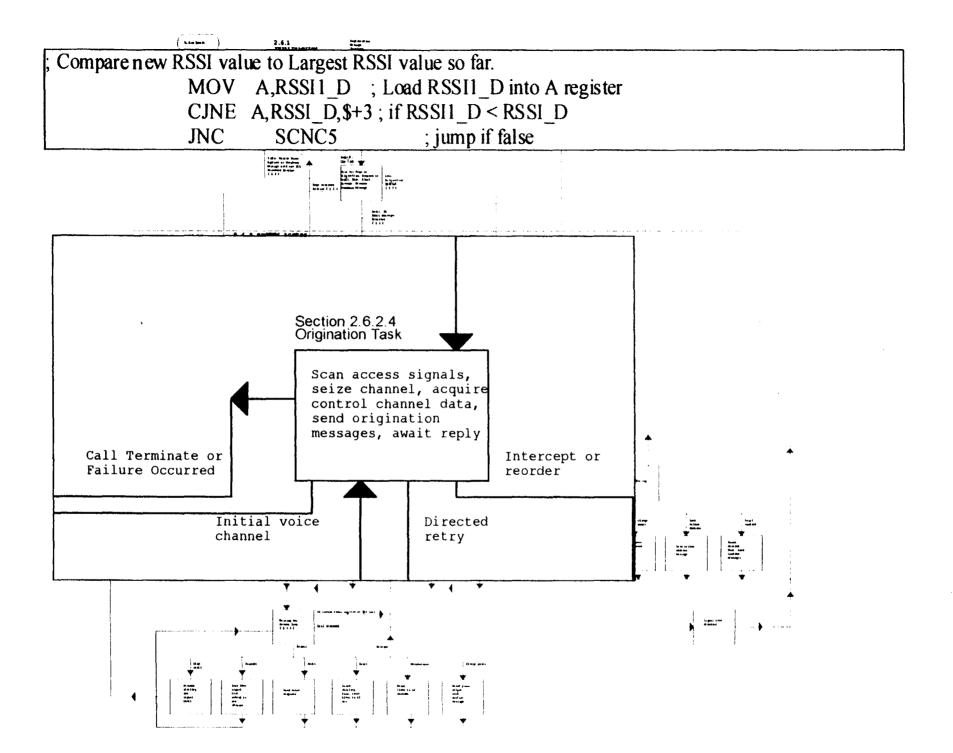
CAL SCNCC; Call the Scan Control Channel Routine

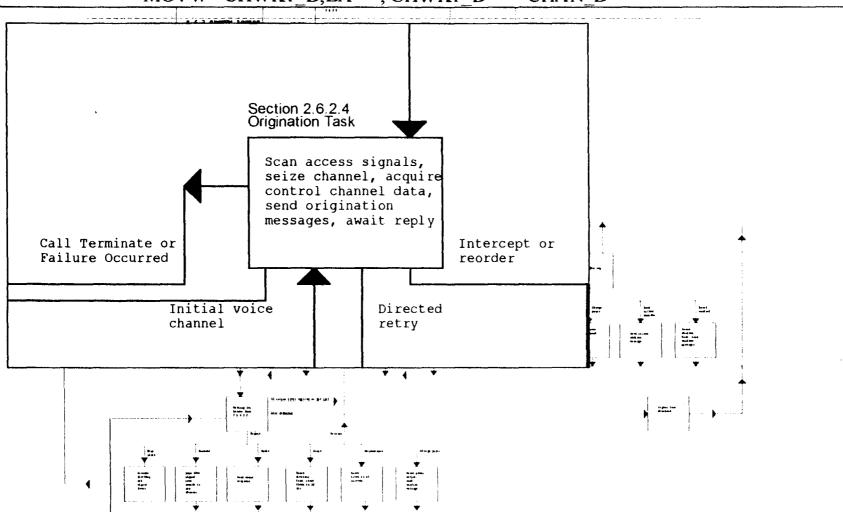


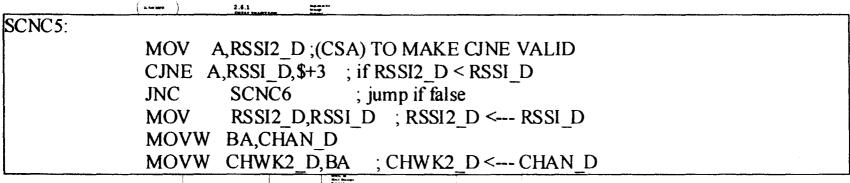
	1.00	TABLE TABLE	<del></del>	
SCNCC	<del>:</del>			
	CLRW	BA; Clear the B	and A registers	
	ST	A,RSSII_D	; RSSII D < 0 (This is the strongest Channel level)	
	ST	A,RSS12 D	; RSSI2 D < 0 (This is the second strongest Channel level)	
	MOVW	CHWK1 D,BA	; CHWK1 D < 0 (This is the strongest Channel number)	
	MOVW	CHWK2 D,BA	; CHWK2 D < 0 (This is the second strongest Channel number)	

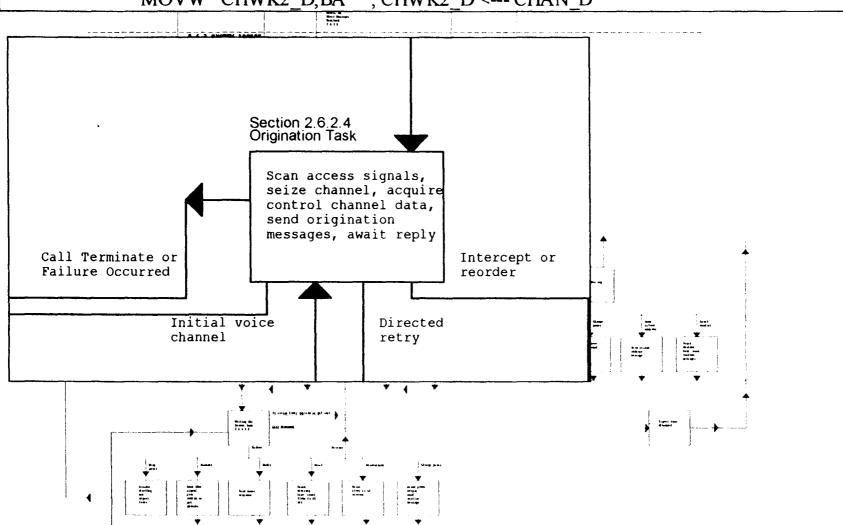






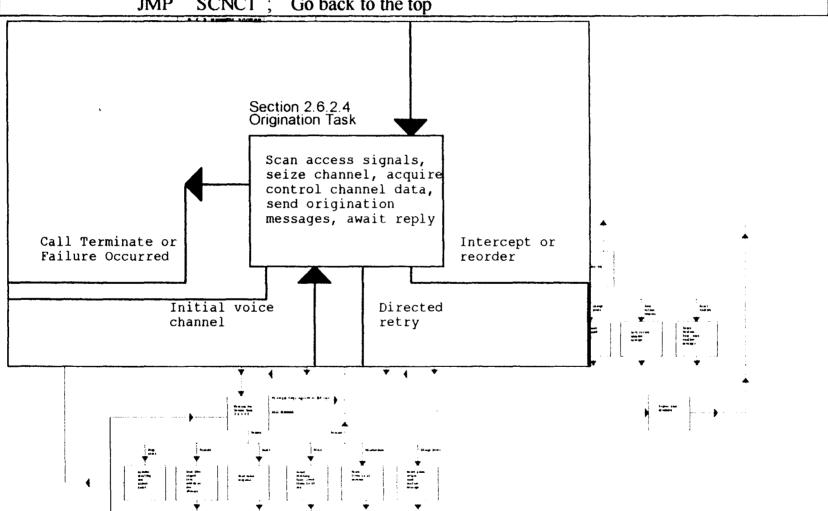


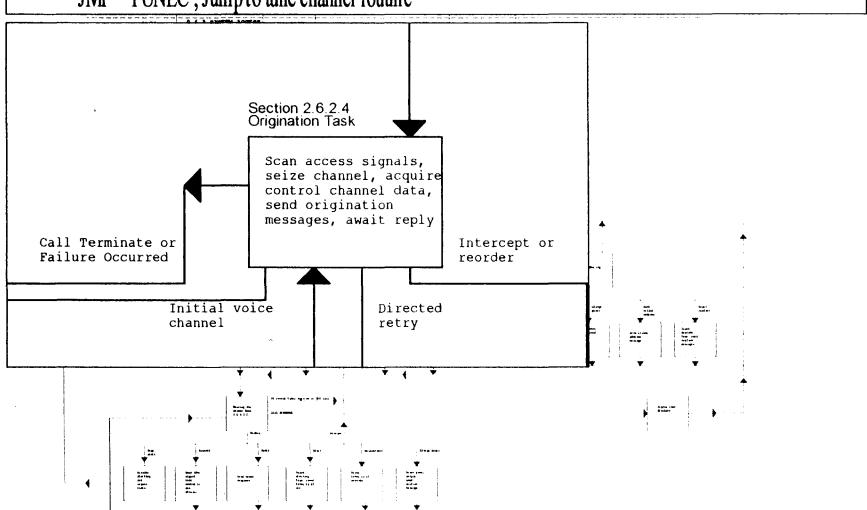


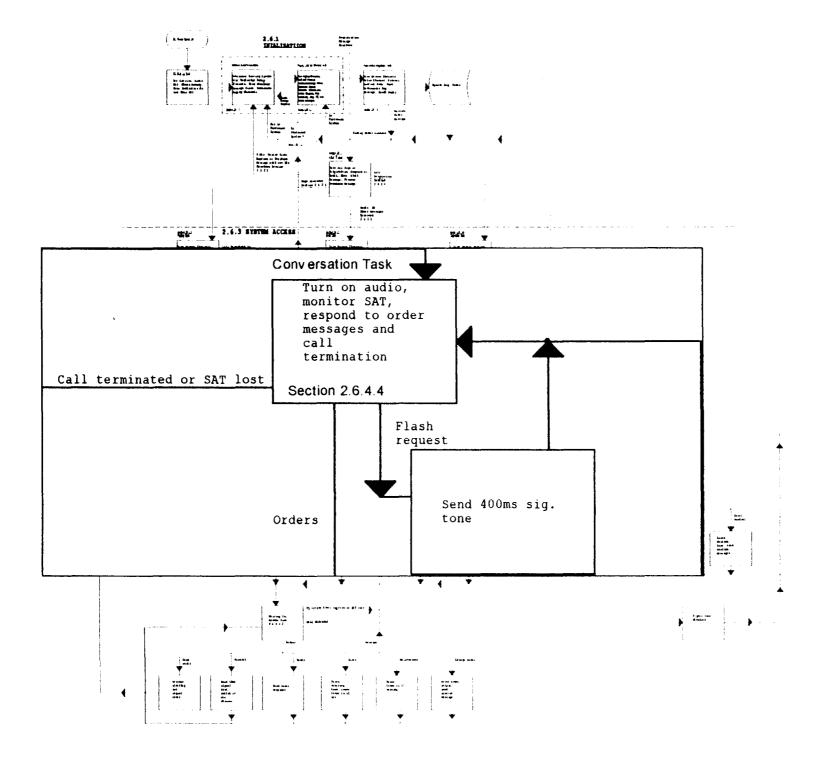


MOV A,NLIST\_D; Load A register with Number of Control Channels
DEC A ; Decrement A
ST A,NLIST\_D ; Store A into Number of Control Channels
JZ SCNC7 ; If A = 0 then Jump to SCN7 (Done with loop)
CALL CNTUPCH ;COUNT UP CHANNEL

CALL FREQS; Tune to new channel
JMP SCNC1; Go back to the top







## Strongest/Adequate Signal

Scan all 21 control channels for Preferred System Section 2.6.3.2

Compare strongest channel to preset Limit (-80 dBm)

If RSSI is greater than or equal to Limit

Tune to Channel

Seize Reverse Control Channel

Connect to PSAP

If RSSI is less than the Limit

Scan remaining control channels

tune to strongest channel across 42 control channels

Seize Reverse Control Channel

Connect to the PSAP

### SCAN DEDICATED CONTROL CHANNEL;

SETB FIRSTPASS; This will indicate if this is the first time through this code **SCNDCC**:

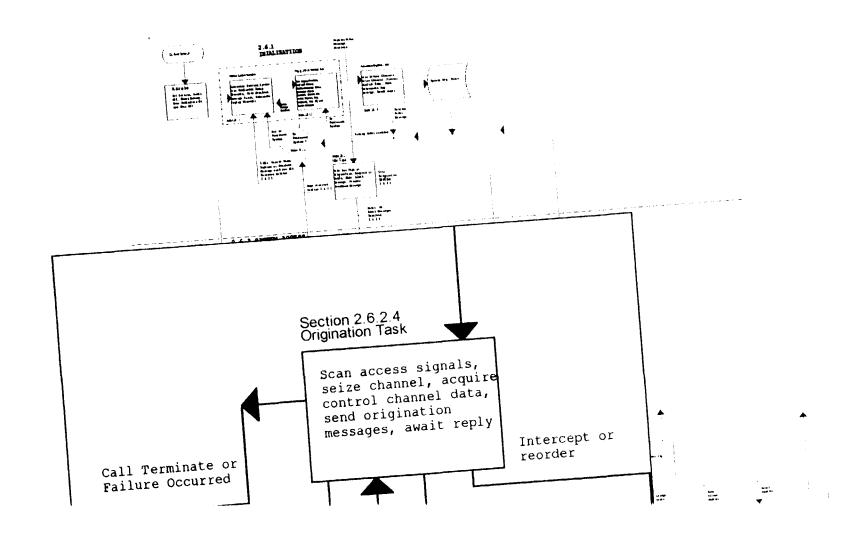
JBR FIRSTPASS, SCNDCC2 ; IF NOT FIRSTPASS CALL JUMP

MOVW BA,#IDCCA; Set A and B register to First Dedicated Control Channel of A system (333)

JBS SSS\_B, DCCHS1; Jump to DCCHS1 if SSS\_B is set to true (This is the A system)

MOVW BA, #IDCCB; Set A and B register to First Dedicated Control Channel of B system (334)

JMP DCCHS1

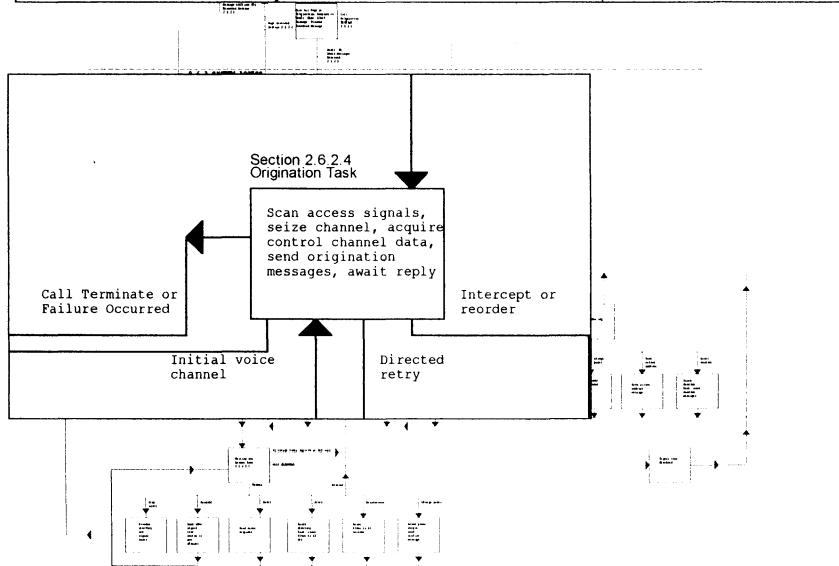


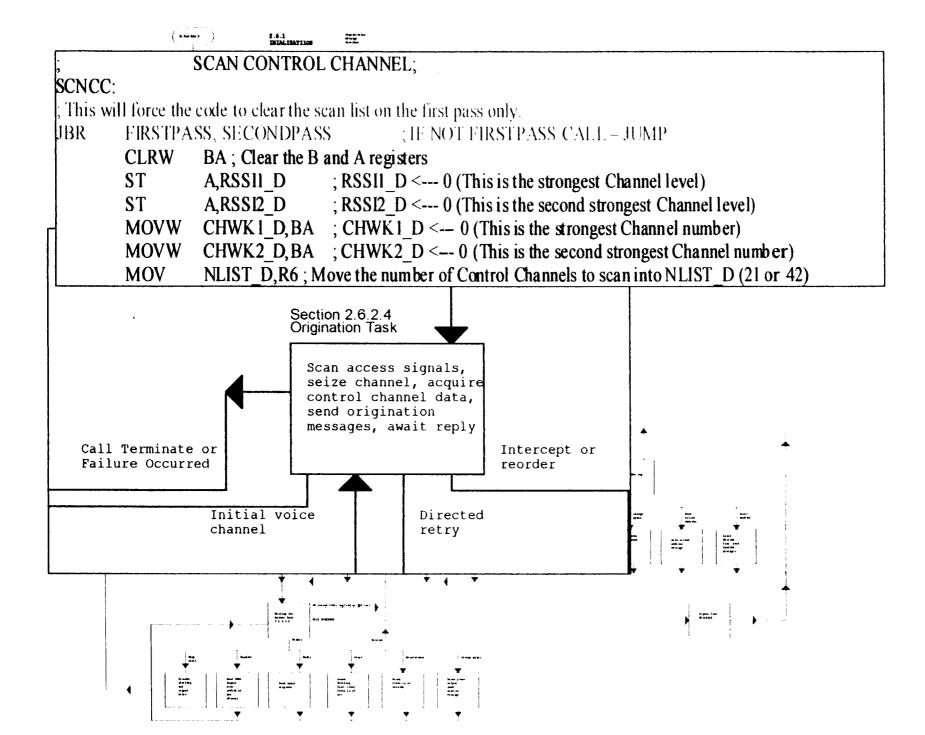
SCNDCC2:

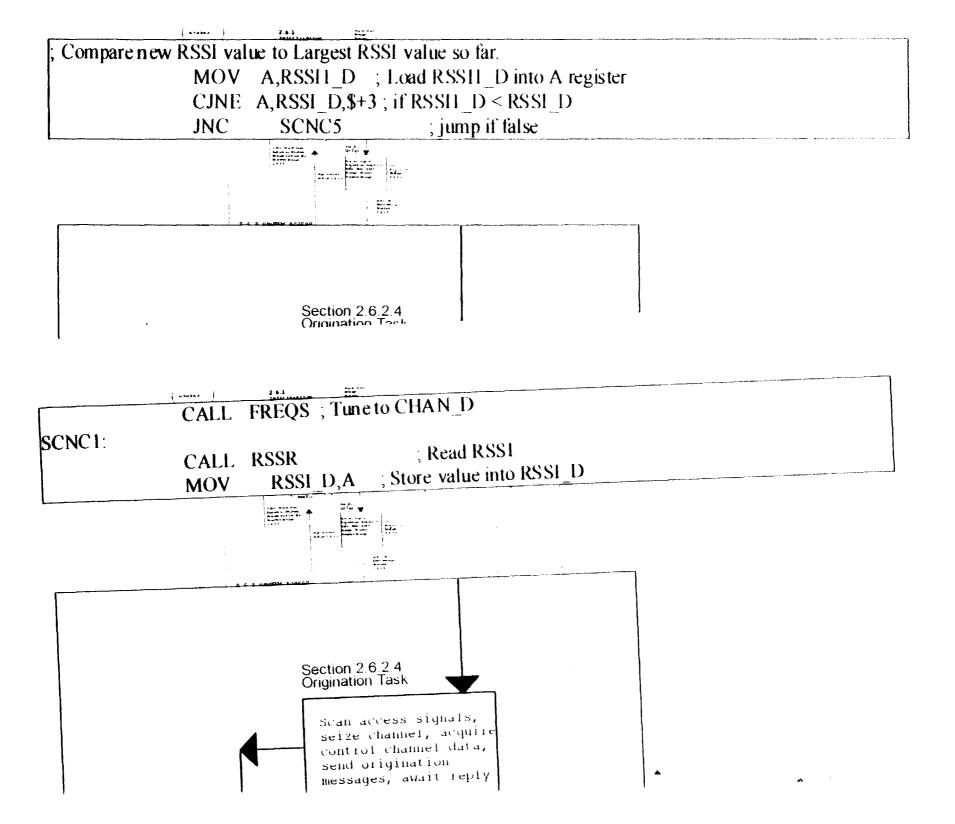
MOVW BA,#354; Set A and B register to Last Dedicated Control Channel of B system (354)

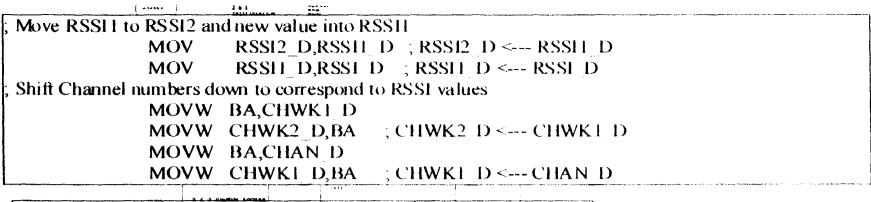
JBS SSS\_B,DCCHS1; Jump to DCCHS1 if SSS\_B is set to true (This is the A system).

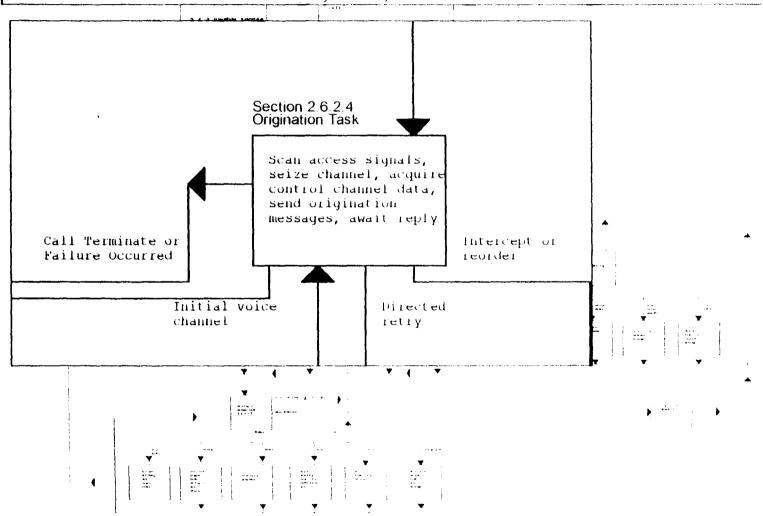
MOVW BA,#313; Set A and B register to Last Dedicated Control Channel of A system (313)

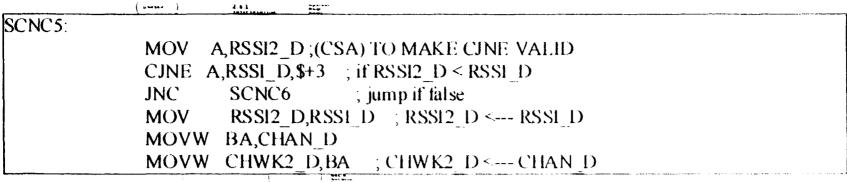


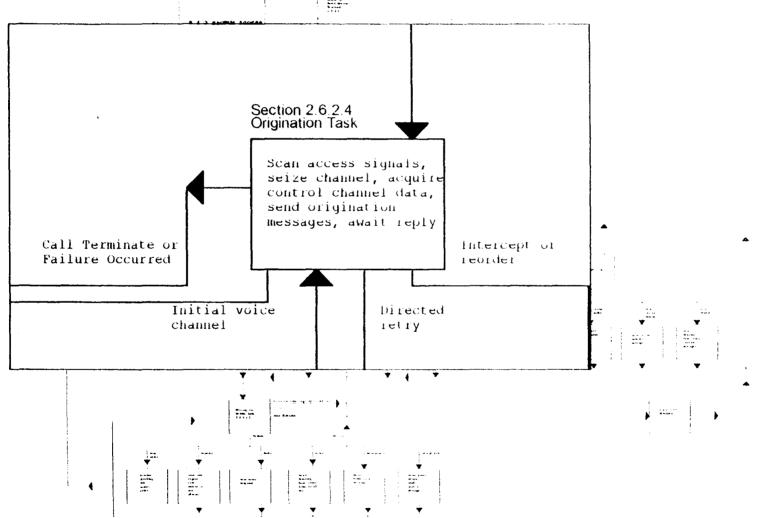


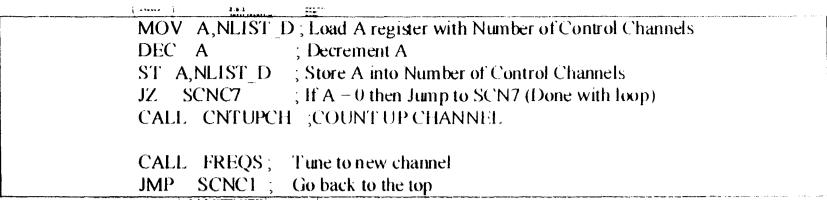


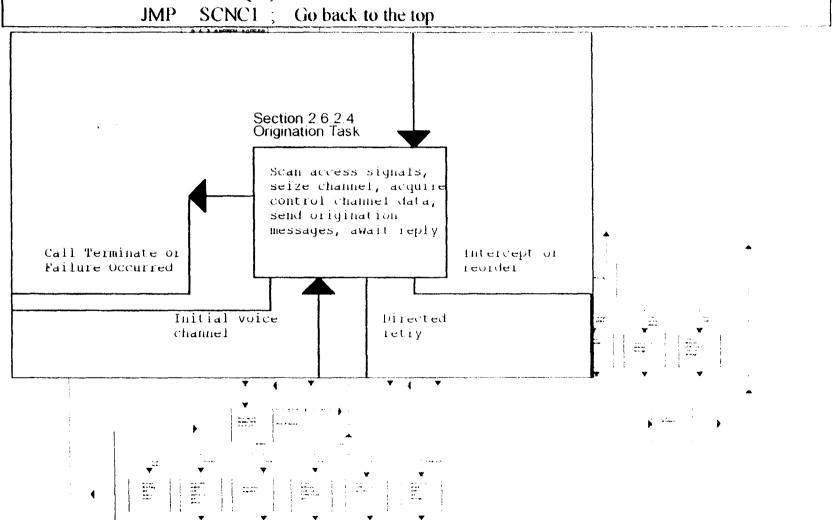


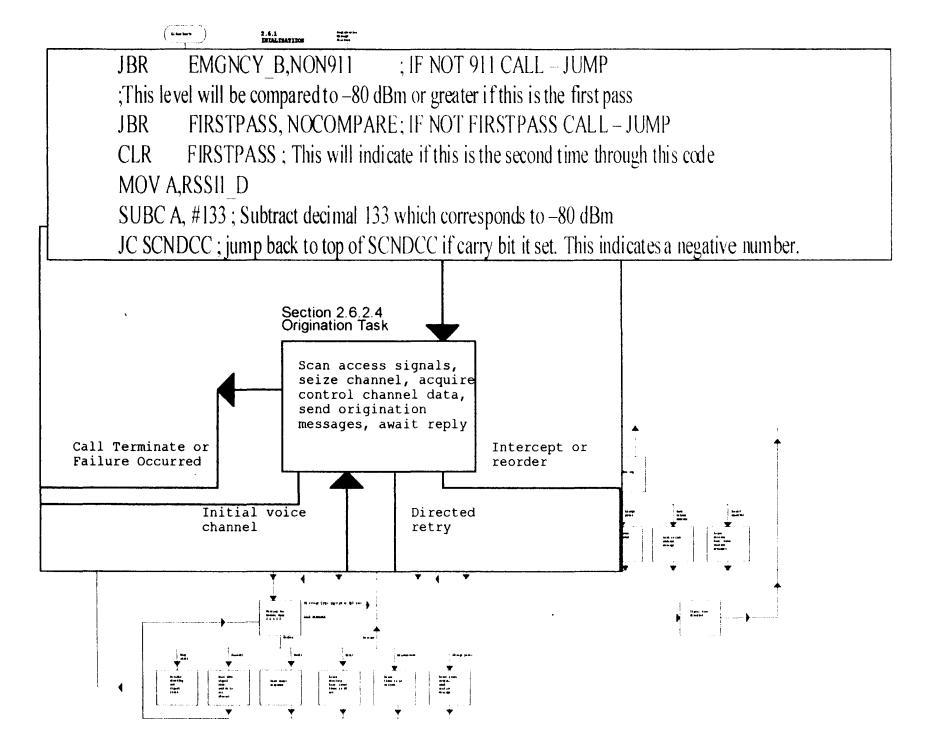




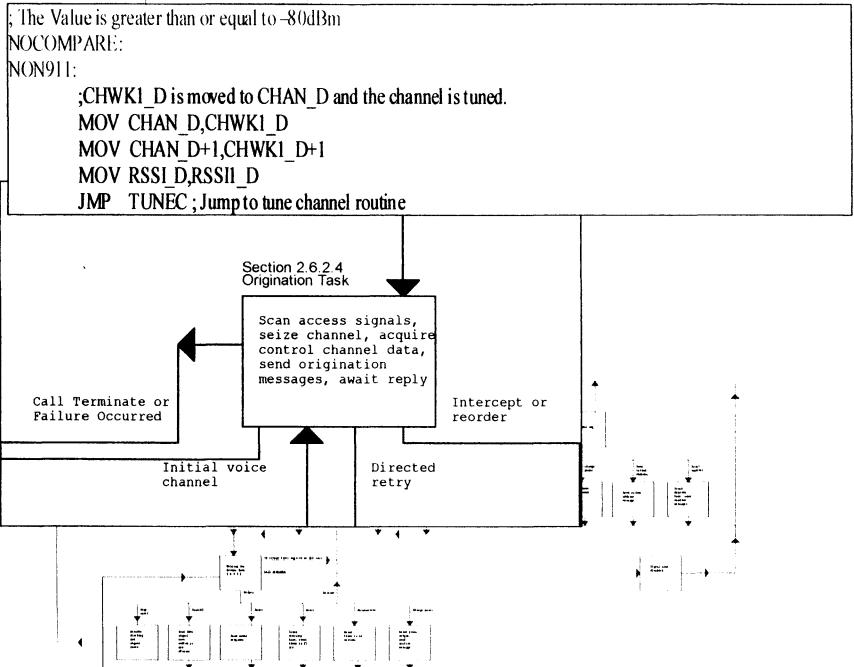


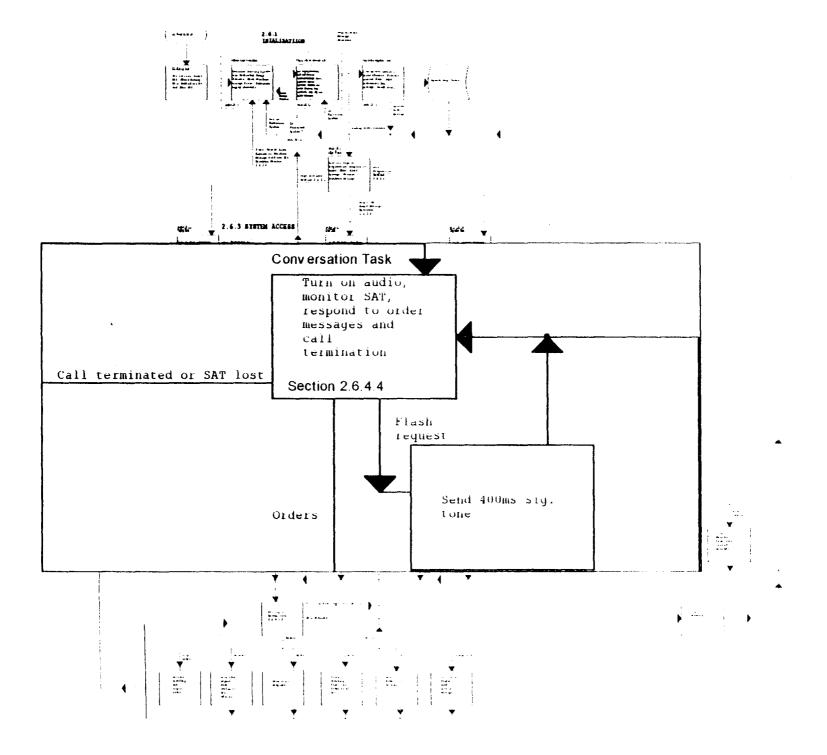












# Cost to Implement

	Strongest/Adequate Signal with Adjustable Threshold Level	Strongest/Adequate Signal	Strongest Signal
Lines of Code	160	25	20
Bytes of Code	480	75	60
Code Analysis	\$120,000.00	\$60,000.00	\$60,000.00
Code Mod.	\$240,000.00	\$37,500.00	\$30,000.00
Code Testing	\$360,000.00	\$240,000.00	\$240,000.00
Manufacturing	\$224,000.00	\$224,000.00	\$224,000.00
Documentation	\$250,000.00	\$0.00	\$0.00
Total	\$1,194,000.00	\$561,500.00	\$554,000.00
Cost/Handset	\$0.12	\$0.06	\$0.06

#### Original Code for section 2.6.3.2

```
From Memory Initialization Task NDED EQU 21; IDCCA EQU 333; IDCCB EQU 334;
```

From Scan Dedicated Control Channel Task.

```
SCAN DEDICATED CONTROL CHANNEL;
SCNDCC:
MOVW
         BA, #IDCCA; Set A and B register to First Dedicated Control Channel of A system (333)
JВS
         SSS_B,DCCHS1; Jump to DCCHS1 if SSS_B is set to true (This is the A system)
MOVW
         BA, #IDCCB; Set A and B register to First Dedicated Control Channel of B system (334)
DCCHS1:
        ST
                  B,CHAN D+1; Store the Channel number from above into the Channel Variable
        ST
        MOV
                  R6,#NDED; Set R6 to 21 (NDED contains 21)
        CAL
                  SCNCC; Call the Scan Control Channel Routine
```

This routine is called with the value of R6 = NDED

```
SCAN CONTROL CHANNEL;
```

#### SCNCC:

```
CLRW BA; Clear the B and A registers ST A,RSSI1_D ; RSSI1_D <-- 0 (This is the strongest Channel level) ST A,RSSI2_D ; RSSI2_D <-- 0 (This is the second strongest Channel level) MOVW CHWK1_D,BA ; CHWK1_D <-- 0 (This is the strongest Channel number) MOVW CHWK2_D,BA ; CHWK2_D <-- 0 (This is the second strongest Channel number) MOV NLIST_D,R6; Move the number of Control Channels to scan into NLIST_D (21)
```

Code to tune to the CHAN\_D and read the RSSI value is here

This will include incrementing the channel through the required number of control channels. The NLIST\_D variable will decrement. If it is not zero the loop will continue.

```
RSSI1_D will contain the strongest level read across the 21 control channels. CHWK1_D will contain the channel number with the strongest RSSI level. RSSI2_D will contain the second strongest level read across the 21 control channels. CHWK2_D will contain the channel number with the second strongest RSSI level.
```

CHWK1\_D is moved to CHAN\_D and the channel is tuned.

MOV CHAN\_D,CHWK1\_D
MOV CHAN\_D+1,CHWK1\_D+1
MOV RSSI\_D,RSSI1\_D
JMP TUNEC; Jump to tune channel routine

#### Strongest Signal Code for section 2.6.3.2

From Scan Dedicated Control Channel Task.

```
SCAN DEDICATED CONTROL CHANNEL;
SCNDCC:
JBR
         EMGNCY B,NON911
                                    H NOT 911 CALL - JUMP
MOVW
          BA.#354. Set A and B register to Last Dedicated Control Channel of B system (354).
          SSS_B,DCCHS1_Jump to DCCHS1 if SSS_B is set to true (This is the A-system).
JBS.
MOVW
          BA.#313. Set A and B register to Last Dedicated Control Channel of A system (313)
MOV
          R6,#42 . Set Ro to 42
NON911:
MOVW
          BA, #IDCCA; Set A and B register to First Dedicated Control Channel of A system (333)
          SSS B,DCCHS1; Jump to DCCHS1 if SSS B is set to true (This is the A system)
JBS
MOVW
          BA, #IDCCB; Set A and B register to First Dedicated Control Channel of B system (334)
MOV
          R6,#NDED; Set R6 to 21 (NDED contains 21)
DCCHS1:
         ST
                   B,CHAN_D+1; Store the Channel number from above into the Channel Variable
         ST
                   A,CHAN_D
         CAL
                   SCNCC; Call the Scan Control Channel Routine
                  SCAN CONTROL CHANNEL:
SCNCC:
         CLRW
                   BA; Clear the B and A registers
         ST
                                   ; RSSI1_D <--- 0 (This is the strongest Channel level)
                  A,RSSII D
         ST
                   A,RSSI2 D
                                   ; RSSI2_D <-- 0 (This is the second strongest Channel level)
         MOVW
                   CHWK1_D,BA ; CHWK1_D <-- 0 (This is the strongest Channel number)
         MOVW
                   CHWK2_D,BA ; CHWK2_D <-- 0 (This is the second strongest Channel number)
         MOV
                  NLIST_D,R6; Move the number of Control Channels to scan into NLIST_D (21 or 42)
Code to tune to the CHAN D and read the RSSI value is here
This will include incrementing the channel through the required number of control channels.
The NLIST_D variable will decrement. If it is not zero the loop will continue.
RSSI1_D will contain the strongest level read across the 21 or 42 control channels.
CHWK1_D will contain the channel number with the strongest RSSI level.
```

RSSI2\_D will contain the second strongest level read across the 21 or 42 control channels. CHWK2\_D will contain the channel number with the second strongest RSSI level.

CHWK1\_D is moved to CHAN\_D and the channel is tuned.

JMP TUNEC; Jump to tune channel routine

MOV CHAN\_D,CHWK1\_D MOV CHAN\_D+1,CHWK1\_D+1 MOV RSSI\_D,RSSI1\_D From Scan Dedicated Control Channel Task.

```
SCAN DEDICATED CONTROL CHANNEL:
SETB FIRSTPASS. This will indicate if this is the first time through this code
SCNDCC:
JBR
         FIRSTPASS, SCNDCC2
                                   THE NOT FIRSTPASS CALL - JUMP
MOVW
          BA, #IDCCA; Set A and B register to First Dedicated Control Channel of A system (333)
JBS
          SSS B,DCCHS1; Jump to DCCHS1 if SSS B is set to true (This is the A system)
MOVW
          BA, #IDCCB; Set A and B register to First Dedicated Control Channel of B system (334)
JMP
        DCCHS1
SCNDCC2
MOVW BA.#354 : Set A and B register to Last Dedicated Control Channel of B system (354):
          SSS_B,DCCHS1 , Jump to DCCHS1 if SSS_B is set to true (This is the A system).
IBS
MOVW
          BA.#313. Set A and B register to Last Dedicated Control Channel of A system (313).
DCCHS1:
         ST
                   B,CHAN D+1; Store the Channel number from above into the Channel Variable
         ST
                   A.CHAN D
         MOV
                   R6,#NDED; Set R6 to 21 (NDED contains 21)
         CAL
                   SCNCC; Call the Scan Control Channel Routine
                  SCAN CONTROL CHANNEL:
SCNCC:
. This will force the code to clear the scan list on the first pass only
JBR
         FIRSTPASS, SECONDPASS
                                             JE NOT FIRSTPASS CALL = JUMP
         CLRW
                   BA; Clear the B and A registers
         ST
                   A,RSSII D
                                   ; RSSI1 D <-- 0 (This is the strongest Channel level)
         ST
                   A.RSSI2<sup>D</sup>
                                   ; RSSI2 D <--- 0 (This is the second strongest Channel level)
         MOVW
                   CHWK1 D,BA ; CHWK1 D <-- 0 (This is the strongest Channel number)
                   CHWK2 D.BA ; CHWK2 D < 0 (This is the second strongest Channel number)
         MOVW
         MOV
                   NLIST_D,R6; Move the number of Control Channels to scan into NLIST_D (21 or 42)
SECONDPASS:
Code to tune to the CHAN D and read the RSSI value is here
This will include incrementing the channel through the required number of control channels.
The NLIST D variable will decrement. If it is not zero the loop will continue.
RSSII_D will contain the strongest level read across the 21 control channels.
CHWK1_D will contain the channel number with the strongest RSSI level.
RSSI2_D will contain the second strongest level read across the 21 control channels.
CHWK2 D will contain the channel number with the second strongest RSSI level.
                                            ; IF NOT 911 CALL = JUMP
                 EMGNCY B,NON911
         This level will be compared to -80 dBm or greater if this is the first pass
        JBR
                 FIRSTPASS, NOCOMPARE; IF NOT FIRSTPASS CALL = JUMP
                 FIRSTPASS: This will indicate if this is the second time through this code
        CLR
        MOV A,RSSIL D
        SUBC A, #133 : Subtract decimal 133 which corresponds to +80 dBm
        JC SCNDCC; jump back to top of SCNDCC if carry bit it set. This indicates a negative number.
. The Value is greater than or equal to -80dBm
NOCOMPARE:
NON911:
        CHWK1 D is moved to CHAN D and the channel is tuned.
        MOV CHAN D,CHWK1 D
        MOV CHAN D+1,CHWK1 D+1
        MOV RSSI_D,RSSI1 D
        JMP TUNEC; Jump to tune channel routine
```

Dave Carey
Giordano Automation Corp.
Vice President Applications Engineering

Dave has 15 years experience as a RF test/design engineer. He worked for 11+ years at Tobyhanna Army Depot developing test software for military communication equipment. He spent 2 years working for PRIMUS Technologies, a circuit board manufacturer, in Williamsport Pa. developing automatic test programs and designing test interface hardware for telecommunications equipment. He was hired at Giordano to develop the application engineering department.

Dave has a variety of accomplishments. He developed a demonstration program using VXI test assets, where he modeled a product and mapped its end to end functional test program into our Diagnostician tool. His electronic engineering and software background makes him very well qualified to work with both manufacturers and ATE suppliers to provide "Factory of the Future" solutions. He develops applications to automate test equipment in both commercial factories and field service depot operations. He also developed an embedded application in the Seawolf Submarines Fault Localization System for Ship Controls. He has designed, developed and maintained automatic test programs, test program interfaces for Automatic test stations, application test systems for a wide variety of circuit card assemblies (RF, digital, micro-controllers, video, and analog,) application test software using Microsoft Visual Basic and National Instruments LabWindows CVI. . He has designed assembly language software for telecommunications equipment. In this function he has become intimately familiar with the AMPS, TDMA and CDMA protocols for cellular telephone equipment. He has experience using, OrCAD 7.0 for interface design development and printed circuit card layout. He developed the ISO-9001 quality documentation and plans for test and design activities. This included supporting the ISO-9001 audit and subsequent updates to Design and Test documentation. He has been a program manager on several manufacturing jobs. This requires scheduling materials for production and test, tracking equipment and manpower resources, identifying production test failures, and performing failure trend analysis.

<u>Awards:</u> Walt Peterson IEEE Memorial Award for the "Most Technologically Significant" paper on "A New Breed of Smart Depot Testers using COTS Technology" at Autotestcon 1995, in Atlanta, Ga.

Education: Dave is a 1983 graduate of Wilkes University. He earned his Bachelor of Science, Electrical Engineering, with a minor in Physics.

On May 16<sup>th</sup>, 1998 he was awarded his Master of Science in Electrical Engineering at Wilkes University. Dave's thesis is titled: "Developing Diagnostic Test Programs using Model-Based Reasoning." He was awarded the "Most Outstanding Electrical Engineering Graduate Student" award for having the highest GPA, 3.90.